

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Jason Edward Miller
Debra Marie Miller
Debtors

Chapter 11

Case No. 11-01000

Lakeview Loan Servicing, LLC
Movant

v.

Jason Edward Miller
Debra Marie Miller
Debtors
and
Jack N. Zaharopoulos
Trustee

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, this 6th day of November 2024, comes the Debtors, Jason E. Miller and Debra M. Miller, by their counsel, CGA Law Firm, Brent C. Diefenderfer, Esquire, and replies to the Motion for Relief from Automatic Stay filed by Lakeview Loan Servicing, LLC as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Paragraph 4 states a legal conclusion and refers to a writing, both of which require no response under the Federal Rules of Bankruptcy Procedure.
5. Denied. Paragraph 5 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.
6. Admitted in part. Denied in part. Debtors tendered the monthly mortgage payments to lender but lender failed to cash the checks.
7. Denied. Paragraph 7 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.
8. Denied. Paragraph 8 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

9. Denied. Paragraph 9 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

10. Denied. Paragraph 10 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

11. Denied. Paragraph 11 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

WHEREFORE, the Debtors request that the Court not enter relief from automatic stay and such other relief as the Court deems necessary and proper.

Respectfully submitted,

CGA Law Firm

/s/Brent C. Diefenderfer, Esquire
Brent C. Diefenderfer, Esquire
Sup. Ct. I.D. No. 93685
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for the Debtors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Jason Edward Miller
Debra Marie Miller
Debtors

Chapter 13

Case No. 24-01001

Lakeview Loan Servicing, LLC
Movant

v.

Jason Edward Miller
Debra Marie Miller
Debtors
and
Jack N. Zaharopoulos
Trustee

CERTIFICATE OF SERVICE

I hereby certify that on November 6th, 2024, I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification of such filing to the following Filing Users:

Chapter 13 Trustee

Brent J. Lemon, Esquire
Counsel for Movant

/s/Brent C. Diefenderfer, Esquire

Brent C. Diefenderfer, Esquire

CGA Law Firm

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